



**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

ELIZABETH BARDAUSKIS
Assistant Corporation Counsel
phone: (212) 356-3159
fax: (212) 356-3509
ebardaus@law.nyc.gov

October 19, 2017

BY ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jasmine Bridgeforth, et al. v. City of New York, et al.
16-CV-273 (WHP) (RLE)

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, and am assigned to represent Defendants City of New York, Detective John Zerafa, Police Officer Rafael Sanchez, Police Officer Mohammed Khan, Sergeant Demetrious Lee, and retired Deputy Inspector Luis Despaigne (hereinafter referred to collectively as "Defendants") in the above-referenced matter. Defendants write in opposition to Plaintiffs' letter dated October 17, 2017, and respectfully request that the Court deny Plaintiffs' motion to deem their Requests for Admissions as admitted.

Plaintiffs served Defendants with "renewed" requests for admissions in June 2017. However, due to an oversight by the undersigned, Defendants did not serve responses to such requests within the thirty days permitted by Fed. R. Civ. P. 36(a)(3). Nonetheless, Defendants served amended responses to Plaintiffs' requests today. Defendants apologize for the belatedness of their responses.

In any event, in light of the fact that Defendants have served amended objections and responses to Plaintiff's Second Set of Requests for Admission, Defendants respectfully request that the Court deny Plaintiff's application.

Defendants thank the Court for its time and consideration in this regard.

Respectfully submitted,

/s/

Elizabeth Bardauskis
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Ryan Lozar, Esq. (Via ECF)
Attorney for Plaintiffs